

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

IN RE GENZYME CORP.  
SECURITIES LITIGATION

Consolidated Case  
No. 09-cv-11267 (GAO)

**LEAD PLAINTIFFS' MOTION FOR LEAVE TO FILE NOTICE OF SUPPLEMENTAL  
AUTHORITY IN SUPPORT OF THEIR OPPOSITION TO DEFENDANTS' MOTIONS  
TO DISMISS**

Lead Plaintiffs hereby move for leave to file a Notice of Supplemental Authority, attached as Exhibit 1, to bring the Court's attention to certain recent authorities also involving securities fraud claims against a defendant drug company that are relevant to a number of issues raised by Defendants' pending motions to dismiss the Consolidated Class Action Complaint, and further support Lead Plaintiffs' arguments that all applicable pleading standards have been satisfied. Defendants Mark A. Bamforth, Alison Lawton, Geoffrey McDonough, David P. Meeker, Henri A. Termeer and Michael S. Wyzga do not oppose the relief requested in this motion. Defendant Genzyme Corporation takes no position on the motion.

Dated: January 17, 2012

Respectfully submitted,

/s/ Bryan A. Wood

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*Co-Lead Counsel for Lead Plaintiffs Deka International S.A.  
Luxembourg, the City of Edinburgh Council as Administering  
Authority of the Lothian Pension Fund, and the Government of  
Guam Retirement Fund*

**LOCAL RULE 7.1(a)(2) CERTIFICATION**

Liaison Counsel hereby certifies, pursuant to Local Rule 7.1(a)(2), that counsel for the Lead Plaintiffs have conferred with counsel for Defendants in a good faith effort to address and resolve the issues presented in this motion and can attest that Defendants Mark A. Bamforth, Alison Lawton, Geoffrey McDonough, David P. Meeker, Henri A. Termeer and Michael S. Wyzga do not oppose the relief requested in this motion and that Defendant Genzyme Corporation takes no position on the motion.

/s/ Bryan A. Wood  
Bryan A. Wood

**CERTIFICATE OF SERVICE**

I, Bryan A. Wood, hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing, and paper copies will be sent to those indicated as nonregistered participants by first class mail on January 17, 2012.

Dated: January 17, 2012

/s/ Bryan A. Wood  
Bryan A. Wood